



Mary-Ann Warmerdam
Director

Department of Pesticide Regulation



Arnold Schwarzenegger
Governor

DRAFT

**Placer County
Pesticide Regulatory Program
2006/2007 Performance Evaluation Report**

**California Environmental Protection Agency
Department of Pesticide Regulation
1001 I Street
Sacramento, California 95814**

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Performance Evaluation of the Placer County Agricultural Commissioner Pesticide Use Enforcement Program

This report provides a performance evaluation of Placer County Agricultural Commissioner's (CAC's) pesticide use enforcement (PUE) program for fiscal year (FY) 2006/2007. The assessment evaluates the performance of goals identified in the CAC's enforcement work plan as well as the program's adherence to Department of Pesticide Regulation (DPR) standards as described in the Pesticide Use Enforcement Standards Compendium.

I. Summary Report of Core Program

A) Restricted Materials Permitting:

The restricted materials permitting program element was found to *meet* DPR standards and work plan goals.

B) Compliance Monitoring:

The compliance monitoring program element was found to *meet* DPR standards and work plan goals.

C) Enforcement Response:

The enforcement response program element was found to *meet* DPR standards and work plan goals.

Summary Statement:

No deficiencies have been identified in the Placer CAC's pesticide use program. Placer CAC's program is currently effective at delivering the local enforcement program of the state.

II. Assessment of Core Program Effectiveness and Work Plan Goals

A) Restricted Materials Permitting:

1) Permit Issuance:

The Placer CAC permit issuance procedures and performance were evaluated through observation and interviews of staff and found to conform to DPR standards and expectations. The three biologists that issue permits all possess Pesticide Regulation and Investigation and Environmental Monitoring licenses. The DPR evaluation determined that permits are:

- Issued only to qualified applicants;
- Signed by authorized persons;
- Issued for time periods allowed by law; and
- Permit amendments follow approved procedures.

2) Site Evaluation:

The Placer CAC site evaluation procedures were evaluated through observation, record review, and interviews of staff and found to conform to DPR standards and expectations. The CAC issued 130 restricted materials permits and 351 operator identification numbers during FY 06/07. The permits:

- Contained the necessary information;
- Identified treatment areas and sensitive areas that could be adversely impacted by permitted uses; and
- Identified mitigation measures and included conditions that addressed known hazards.

The CAC staff adequately evaluated and determined if the use of feasible alternatives was required. The program reviews all Notices of Intent (NOIs) in a timely manner and adequately monitored agricultural and nonagricultural permits utilizing pre-application site evaluations and use monitoring inspections.

B) Compliance Monitoring:

1) Inspections:

The Placer CAC permit inspection procedures and performance were evaluated through DPR oversight inspections and record review and found to conform to DPR standards and expectations. One biologist that possesses Pesticide Regulation and Investigation and Environmental Monitoring licenses works as the lead person in PUE. Two biologists that possess Pesticide Regulation and Investigation and Environmental Monitoring assist as needed. Inspections are performed according to DPR policies and procedures and inspection reports are complete and comprehensive. The inspections adequately provide the information necessary to successfully prosecute violations.

Inspections performed by the CAC were found to:

- Adequately address label, law, and regulatory requirements;
- Include interviews of employers and employees as appropriate;
- Adequately document violations; and
- Include appropriate follow-up inspections and procedures.

The Placer CAC has several experienced biologists that act as resources for less experienced biologists.

2) Investigations:

The Placer CAC investigation procedures and performance were evaluated through observation, record review, and interviews of staff and found to conform to DPR standards and expectations. The CAC investigates all complaints and completes inspection reports in a timely manner. The CAC notifies DPR and other agencies as required.

Investigations are thorough, complete, and submitted on approved forms and in an approved format. The investigations document violations and the CAC collects evidence according to DPR standards. The investigations adequately provide information necessary to successfully prosecute violations.

Experienced staff helps the CAC maintain a high level of professionalism in the field.

C) Enforcement Response:

The Placer CAC enforcement response was evaluated through observation, record review, and interviews of staff and found to conform to DPR standards and expectations. The CAC's enforcement response was found to:

- Initiate appropriate action when violations were identified;
- Ensure that due process requirements are met when taking enforcement or permit action or when initiating a private applicator certification or registration refusal/revocation;
- Sufficiently support compliance; and
- Adequately protect the public and the environment.

The Placer CAC enforcement response was found to be timely and effective.

III. Recommendations:

Recommendations include more field experience for newer employees, especially during rice season.

IV. Non-Core and Desirable Activities

Desirable non-core activities include increased outreach to maintenance gardeners.